

March 18, 2021

**VIA ECF**

The Honorable Sarah L. Cave, U.S.M.J.  
United States District Court, Southern District  
500 Pearl Street, Room 702  
New York, NY 10007

The request to seal Defendants' filing at ECF No. 363 is GRANTED. By **March 23, 2021**, Defendants shall file an appropriately redacted version of this filing on the docket.

The requested anticipated redactions for the forthcoming Rule 37 Motion briefing is GRANTED. Anything referencing the disciplinary history of Plaintiff Captain Mascol, as well as any alleged misconduct **must be redacted** in public filings.

The Clerk of Court is directed to seal ECF No. 363 completely pending the appropriately redacted filing, and is directed to close the Letter-Motion at ECF No. 366.

SO ORDERED      3/18/2021

**Re:    Local 3621, et al v. City of New York, et al; Index 1**

  
SARAH L. CAVE  
United States Magistrate Judge

Your Honor:

We write pursuant to Judge Liman's Order earlier today [ECF No. 365] to respectfully request that, in the immediate, the Court direct that Defendants' letter filed yesterday [ECF No. 363] be sealed until Defendants' counsel can properly redact it to comport with the Court's December 10, 2020 Order [ECF No. 259].

Second, Plaintiffs' respectfully request permission to file their intended FRCP 37 motion with the appropriate redactions and sealing to comply with this Court's Order requiring that the "details and underlying facts of [Plaintiff Captain Mascol's] disciplinary history" be kept confidential. [ECF No. 259]; *see United States v. Amodeo*, 71 F.3d 1044, 1051 (2d. Cir. 1995). This would include redacting anything referencing the disciplinary history of Plaintiff Captain Mascol, as well as Defendants' accusations regarding allegations of misconduct associated with such history both against Plaintiffs and Plaintiffs' counsel and sealing the documents relevant to these allegations.

Thank you in advance for your time and attention to this matter.

Respectfully Submitted,

/s/  
Yetta G. Kurland

85 BROAD STREET  
28<sup>th</sup> FLOOR  
NEW YORK, NY 10004

P: 212 253 6911  
F: 212 614 2532

kurland@kurlandgroup.com  
KURLANDGROUP.COM

New York | Washington, D.C.